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BEFORE THE ARIZONA CORPORATION COMMISSION

2010 SEP 13 P 4:08

COMMISSIONERS:
KRISTIN K MAYES – Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF:

Docket No. S-20600A-08-0340

MARK W. BOSWORTH and LISA A.
BOSWORTH, husband and wife;

STEPHEN G. VAN CAMPEN and DIANE V.
VANCAMPEN, husband and wife;

MICHAEL J. SARGENT and PEGGY L.
SARGENT, husband and wife;

ROBERT BORNHOLDT and JANE DOE
BORNHOLDT, husband and wife;

MARK BOSWORTH & ASSOCIATES, LLC,
An Arizona limited liability company;

3 GRINGOS MEXICAN INVESTMENTS, LLC;
An Arizona limited liability company

Respondents.

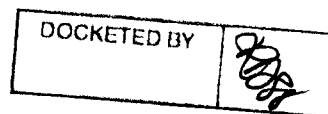
RESPONDENTS

MARK W. BOSWORTH
MARK BOSWORTH & ASSOCIATES, LLC
3 GRINGOS MEXICAN INVSTMENTS, LLC

RESPONSE TO THE SECURITIES
DIVISION'S MOTION TO SET HEARING

Arizona Corporation Commission
DOCKETED

SEP 13 2010



Respondents Mark W. Bosworth, Mark Bosworth & Associates, LLC and 3 Gringos Mexican Investments, LLC respectfully objects to the Securities Division's (Division) motion to set hearing. We already have a hearing-in progress!! There is no cause.

The division's claim on their reasoning is false and disingenuous at best. It is a manipulation of the Administrative Law System. The division was at all times BEFORE Mark Bosworth gave testimony perfectly aware of the question regarding 3GMI and the transfer of real property.

1 The divisions made a conscience choice to manipulate the hearing by having
2 Bosworth testify then accost Mr. Bosworth in the hallway to attempt to manipulate the long and
3 carefully negotiated settlement. Mr. Bosworth did not intend to give up his Fifth Amendment
4 rights without the agreement in place, allegedly subject only to the commissioner's final
5 approval.

6
7 Mr. Ludwig agreed that Mr. Bosworth did a "wonderful job and has fully
8 complied with his agreement with the division."

9 Ms. Coleman agreed as well stating it was a "great job" and that the agreement
10 "was fully lived up" to by Mr. Bosworth.

11 The division has no authority to pull a respondent out of a hearing so they can get a better
12 shot at them alone in a separate hearing, an administrative version of double jeopardy. There is
13 no legal basis for their absurd request.

14
15 Additionally in the division's own motion of September 11, 2008(see attached), they
16 claim on page 4 #C "The division's interest in proceeding expeditiously is great"!! They
17 continue with "ANY delay in prosecuting this matter will adversely affect the division's
18 interests" and "ANY delay would have a detrimental effect on the public confidence in the
19 enforcement efforts of the division". They make the SAME EXACT claim on their September 5,
20 2008 filing in response to the Sargent's motion.

21
22 We raised relentless concerns about lack of proper trial preparation as follows "In
23 addition, they note that Bornholdt's very questionable alleged unavailability at this very late hour
24 further supports the need for a continuance, and support the Sargent's request for such. We are
25 gravely concerned this process will be compromised later because it has not been properly
26
27
28

1 planned for before it starts. Thank you." The division would not hear of it! We had to go to trial
2 NOW!!

3 Both the division AND Mr. Sabo (by email) were advised in the objection to Bornholdt's
4 telephonic testimony motion that the "Bosworth's et al" had been left out of the time
5 management of the hearing etc.. etc... as follows "Respondent Bosworth was left out of the
6 pretrial conference in regards to planning and preparing for the time necessary to schedule and
7 execute an appropriate hearing due to pending settlement While not an attorney I find it unusual
8 to plan a hearing without this or any other information from Respondent Bosworth. On
9 Bornholdt alone we anticipate (6) to (8) hours to review general information, (2) two to (6) hours
10 for each of the alleged claims/victims for a total of (45) to (60) hours, (2) hours on his revoked
11 Notary license and bond, (3) hours on other ethical responsibility, duties and actions under
12 Arizona Administrative Code Title 4 Chapter 28 Article 11, (5) hours regarding Article 5 and all
13 advertising, (6) hours on his recruiting of victims in this case for the ACC and the documents,
14 claims and promises he made to them, not counting unexpected items. This is approx (60) hours
15 of who we believe is the key to this whole investigation, Bornholdt. Would we not lose the
16 whole case if one day Bornholdt decides or becomes unavailable? Seems very risky and
17 potentially costly and unnecessary. The Administrative Law Judge has given NO time limits or
18 time expectation to respondent Bosworth of any kind for this hearing and is fully aware of
19 respondent's inability to retain counsel and that self-representation is the only reluctant choice
20 available to Bosworth".

21 This motion was NOT filed specifically at the request of the division and a settlement
22 was suddenly reached within hours of them reading the document. While not filed at that time
23
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1 bath parties were aware then of the "Red Herring" and both did nothing to resolve the issue. The
2 motion was filed today with this response to become part of the record.

3 The division has known for months and did nothing. Now that they have Mr.
4 Bosworth's testimony they are singing a whole new tune.

5 Mr. Sargent was allowed a voluminous amount of time under the pretense he
6 would prepare to testify and not merely take the fifth on all his testimony. The Honorable
7 Administrative Law Judge Marc E. Stern saw fit to allow respondent Sargent all the time needed
8 to make the hearing fair and equitable. The Bosworth's deserve the same fair and equitable
9 treatment.
10

11 The Bosworth's are the only group not able to afford an attorney. During a
12 hearing Mr. Bosworth is the only person in the room not getting paid for being there. It would be
13 a huge, unfair and unbearable burden for Mr. Bosworth to now attend this hearing AND another
14 separate hearing months or years later.
15

16 What if some witnesses that are beneficial to Bosworth do not show up to testify for the
17 additional hearing?
18

19 The division is the one that insisted all along that there could not be separate
20 hearing and the respondent's must be heard together. Sargent and Bosworth both vigorously
21 sought separate hearings. Does the division now get to impose the additional burdens of time and
22 valuable financial resources two years later of preparing differently for ANOTHER HEARING?
23

24 Accordingly, Mark W. Bosworth, Mark Bosworth & Associates, LLC & 3
25 Gringos Mexican Investments vigorously oppose the Division's motion to set a hearing during
26 the middle of an existing hearing.
27
28

1
2 RESPECTFULLY SUBMITTED this 12th day of September 2010

3
4 By 

5 Mark Bosworth
6 18094 N. 100th Street
7 Scottsdale, Arizona 85255

8 ORIGINAL FILED WITH:

9 Docket Control
10 Arizona Corporation Commission
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2 7008 SEP -5 P 4: 35

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4 AZ CORP COMMISSION
DOCKET CONTROL

5 COMMISSIONERS

6 MIKE GLEASON, Chairman
7 WILLIAM A. MUNDELL
8 JEFF HATCH-MILLER
9 KRISTIN K. MAYES
10 GARY PIERCE

11 In the matter of:

12 MARK W. BOSWORTH and LISA A.
13 BOSWORTH, husband and wife;

14 STEPHEN G. VAN CAMPEN and DIANE
15 V. VAN CAMPEN, husband and wife;

16 MICHAEL J. SARGENT and PEGGY L.
17 SARGENT, husband and wife;

18 ROBERT BORNHOLDT and JANE DOE
19 BORNHOLDT, husband and wife;

20 MARK BOSWORTH & ASSOCIATES,
21 L.L.C., an Arizona limited liability company;

22 3 GRINGOS MEXICAN INVESTMENTS,
23 L.L.C., an Arizona limited liability company;

24 Respondents.

DOCKET NO. S-20600A-08-0340

RESPONSE TO RESPONDENTS MICHAEL J.
AND PEGGY L. SARGENT'S MOTION TO
STAY

(Assigned to the Honorable Marc E. Stern)

25 The Securities Division ("the Division") of the Arizona Corporation Commission ("the
26 Commission") hereby responds to Respondents Michael J. and Peggy L. Sargent's ("Sargent")
Motion to Stay ("the Motion") and requests that it be denied. This Response is supported by the
following Memorandum of Points and Authorities.

SCANNED

9-11-08

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9-11-08

MEMORANDUM OF POINTS AND AUTHORITIES**I. INTRODUCTION**

Sargent allegedly heard that he is a target of a criminal investigation. This can be neither confirmed nor denied. What can be confirmed, however, is that Sargent is **NOT** the defendant in any criminal case, he does **NOT** face criminal charges, and he has **NOT** been indicted.

In the Motion, Sargent has requested a stay of this proceeding because he **MAY** wish to assert his Fifth Amendment right to remain silent when asked questions by the Division. What if the Division doesn't ask him any questions?

Sargent is essentially asking the Administrative Law Judge to indefinitely delay justice for the dozens of investors who deserve to have the merits of this case heard and to have liability for their millions of dollars of losses determined. To maintain public confidence in the enforcement efforts of the Division, this case must not be delayed.

Sargent cannot show the substantial prejudice to his rights that is required by law for a stay. As such, the Motion should be denied.

II. ARGUMENT

Whether to grant a stay in this proceeding is within the sound discretion of the Administrative Law Judge. See, State v. Ott, 167 Ariz. 420, 428, 808 P.2d 305, 313 (Ct. App. 1990) (citing Afro-Lecon v. United States, 820 F.2d 1198, 1202 (Fed. Cir. 1987)). Neither the federal nor the state constitution prohibits parallel civil and criminal proceedings. Id. (citing United States v. Kordel, 397 U.S. 1, 12 n. 27 (1970)). In fact, civil proceedings generally should be stayed only if parallel proceedings would substantially prejudice the defendant's rights. Id. (citing Securities and Exchange Comm'n v. Dresser Industries, 628 F.2d 1368, 1374 (D.C. Cir.), cert. denied, 449 U.S. 993 (1980)). The decision whether to stay civil proceedings in the face of a parallel criminal proceeding should be made "in light of the particular circumstances and competing interests involved in the case." Federal Sav. & Loan Ins. Corp. v. Molinaro, 889 F.2d 899, 902 (9th Cir. 1989).

1 The strongest case for granting a stay is where a party under criminal indictment is required
2 to defend a civil proceeding involving the same matter. Dresser Industries, F.2d at 1375-76. The
3 decisionmaker should consider the extent to which the defendant's Fifth Amendment rights may be
4 implicated. See, e.g., Keating v. Office of Thrift Supervision, 45 F.3d 322, 324 (9th Cir. 1994), cert.
5 denied, 516 U.S. 827 (1995). In addition, the decisionmaker should generally consider the
6 following factors: (1) the interest of the plaintiff in proceeding expeditiously with the litigation and
7 any potential prejudice to plaintiff if the proceeding is delayed, (2) the burden that is imposed on the
8 defendant, (3) the convenience of the court in the management of its cases and the efficient use of
9 judicial resources, (4) the interests of persons that are not parties to the civil litigation, and (5) the
10 interest of the public in the pending proceedings. See, e.g., Keating, 45 F.3d at 324-25. When one
11 considers Sargent's Fifth Amendment rights as well as the remaining factors, it is clear the analysis
12 does not support a stay of this proceeding.

13 **A. Sargent's Fifth Amendment Rights are not Implicated in this Proceeding.**

14 Even where the same individual defendant is involved in both civil and criminal
15 proceedings, the courts can require a litigant to choose between invoking the Fifth Amendment in
16 a civil case, thus risking a loss there, or answering the questions in the civil context, thus risking
17 subsequent criminal prosecution. See, e.g., Baxter v. Palmigiano, 425 U.S. 308, 318-19 (1976).
18 Generally, in such cases the courts have allowed the civil case to proceed after weighing the
19 competing interests involved. See, e.g., State v. Ott, 167 Ariz. 420, 808 P.2d 305 (Ct. App. 1990);
20 Keating v. Office of Thrift Supervision, 45 F.3d 322 (9th Cir. 1994), cert. denied, 516 U.S. 827
21 (1995); Federal Sav. And Loan Ins. Corp. v. Molinaro, 889 F.2d 899 (9th Cir. 1989); Securities &
22 Exchange Comm'n v. Dresser Indus., 628 F.2d 1368, 1376 (D.C. Cir.) cert. denied, 449 U.S. 993
23 (1980).

24 Like this case, Keating and Molinaro involved administrative agencies bringing actions in
25 the public interest. But unlike this case, the defendants in Keating and Molinaro were individuals
26 who were charged in both the civil and criminal proceedings. In both cases the courts found, after

1 weighing the competing interests (including the extent to which the defendants' Fifth Amendment
2 rights were implicated), that it was appropriate to allow the civil proceedings to continue. Keating,
3 45 F.3d at 326; Molinaro, 889 F.2d at 902-03.

4 The case for staying civil proceedings is "a far weaker one" when "[n]o indictment has been
5 returned [and thus] no Fifth Amendment privilege is threatened." Molinaro, 889 F.2d at 903
6 (quoting Dresser Industries, 628 F.2d at 1376). No indictments have been returned in this case, thus
7 no Fifth Amendment rights are threatened.

8 **B. The Division's Interest in Proceeding Expeditiously is Great.**

9 Any delay in prosecuting this matter will adversely affect the Division's interests. Dozens of
10 Arizona investors are waiting for an opportunity to have the merits of this case heard. Any delay
11 would have a detrimental effect on public confidence in the enforcement efforts of the Division. It is
12 appropriate for the Administrative Law Judge to consider this factor in determining whether a stay
13 should be granted. See, Keating, 45 F.3d at 326 (detrimental effect on public confidence in
14 enforcement scheme for thrift institutions would occur from stay); Molinaro 889 F2d at 903
15 (interests of depositors would be frustrated from stay).

16 **C. Sargent will not have any Greater Burden upon Denial of a Stay.**

17 Denial of a stay will not negatively affect (in fact, it may enhance) Sargent's ability to mount
18 his defense in this case. Even though he may exercise his right to remain silent, Sargent will still be
19 able to cross examine the witnesses against him (in this case, scores of investors and others who will
20 testify as to the often-complicated financial transactions involved in the fraud perpetrated on
21 investors and to authenticate the hundreds of documents involved), introduce and challenge
22 evidence, etc. The longer the delay as a result of a stay, the more likely it is that memories will fade
23 and the harder it will be for Sargent to mount his defense.

24 **D. A Stay will not Provide Greater Convenience to the Parties and/or Division.**

25 A stay would be inconvenient not only because of the delay, but because the Division
26 would be forced to put on its case at least twice – first against respondents who are not the

1 subject of a stay and later against the others. Of course, a stay as to all respondents is out of the
2 question and would not only be violative of the law, it would be contrary to the interests of the
3 investors in this case and the public as a whole.

4 **E. Investors will Suffer if a Stay is Granted.**

5 It could be said that the harm to investors is complete and that investors do not have a
6 compelling need for immediate resolution of the Division's allegations. Such an argument does not
7 give the respect to, or understanding of, investors' positions that investors deserve.

8 This case involves dozens of investors who have lost more than money, they have lost faith.
9 The investors are seeking justice and an understanding of what exactly happened. They want to
10 know how they lost money when there were professionals like Sargent involved with Mark
11 Bosworth and his companies. They want and deserve liability determined.

12 **F. The Public Interest will be Adversely Affected by a Stay.**

13 Citing uncontrolling authority, Sargent essentially argues that the public's interest in a
14 prospective criminal case is entitled to precedence over this, pending case. Sargent also argues that,
15 since the Division is immune to any statutes of limitation and since there are no ongoing sales of
16 securities, the public's interest will not be adversely affected by a stay. On the contrary, there is a
17 pressing need to determine the liability of parties involved in this tragic situation. As a regulatory
18 body, the Division is keenly aware of the need to reassure the public that it is seeking a
19 determination of responsibility. See, Keating, 45 F.3d at 326. It would be completely unacceptable
20 to allow this case to drag on unprosecuted for months, years even.

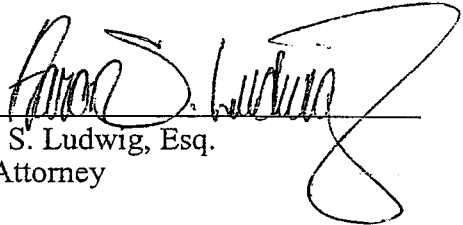
21 If the Division's allegations in its Notice are true, there is more to this case than just a
22 failure to disclose risks; there was actual perpetration of fraud by Sargent. There can be no
23 stronger public interest than to send a message to the financial community that the Division will
24 take action against professionals when such action is warranted. Any delay would be detrimental
25 to public confidence in the enforcement scheme of the Securities Act. Id.

III. CONCLUSION

Based on the foregoing, it is apparent that Sargent has not shown any prejudice, let alone substantial prejudice, to his rights by this case proceeding. Sargent's Fifth Amendment rights are not implicated and the remaining factors all support the conclusion that this matter should continue. Accordingly, the Motion should be denied.

RESPECTFULLY SUBMITTED this 5th day of September 2008.

**SECURITIES DIVISION of the
ARIZONA CORPORATION COMMISSION**



Aaron S. Ludwig, Esq.
Staff Attorney

ORIGINAL and **13 COPIES** of the foregoing filed
this 5th day of September 2008 with:

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Phoenix, AZ 85007

COPY of the foregoing mailed/delivered
this 5th day of September 2008 to:

The Honorable Marc E. Stern
Hearing Division
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AZ CORP COMMISSION
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

MIKE GLEASON, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

In the matter of:

MARK W. BOSWORTH and LISA A.
BOSWORTH, husband and wife;

STEPHEN G. VAN CAMPEN and DIANE
V. VAN CAMPEN, husband and wife;

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SARGENT, husband and wife;

ROBERT BORNHOLDT and JANE DOE
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3 GRINGOS MEXICAN INVESTMENTS,
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Respondents.

DOCKET NO. S-20600A-08-0340

**RESPONSE TO JOINDER OF RESPONDENTS
STEPHEN VAN CAMPEN AND DIANE VAN
CAMPEN IN RESPONDENTS SARGENT'S
MOTION TO STAY PROCEEDINGS**

(Assigned to the Honorable Marc E. Stern)

The Securities Division ("the Division") of the Arizona Corporation Commission ("the Commission") hereby responds to the Joinder of Respondents Stephen Van Campen and Diane Van Campen's ("Van Campen") in Respondents Sargent's Motion to Stay Proceedings ("the Joinder") and requests that it be denied. This Response is supported by the following Memorandum of Points and Authorities.

SCANNED

9-15-08

RECEIVED
9-15-08

MEMORANDUM OF POINTS AND AUTHORITIES**I. INTRODUCTION**

Van Campen says that he is the subject of two criminal investigations and he would like the Administrative Law Judge to believe this because he says it is so. This can be neither confirmed nor denied. What can be confirmed, however, is that Van Campen is **NOT** the defendant in any criminal case, he does **NOT** face criminal charges, and he has **NOT** been indicted.

In the Joinder, Van Campen has requested a stay of this proceeding because he **MAY** wish to assert his Fifth Amendment right to remain silent when asked questions by the Division. This argument is speculative on at least two levels. First, Van Campen may in fact answer questions put to him by the Division and refrain from asserting his right to remain silent. Second, even if he asserts his right, the Division may not ask Van Campen any questions and may instead prove its case through witness testimony, documentary evidence, etc.

Van Campen is essentially asking the Administrative Law Judge to indefinitely delay justice for the dozens of investors who deserve to have the merits of this case heard and to have liability for their millions of dollars of losses determined. To maintain public confidence in the enforcement efforts of the Division, this case must not be delayed.

Van Campen cannot show the substantial prejudice to his rights that is required by law for a stay. As such, the Joinder should be denied.

II. ARGUMENT

Whether to grant a stay in this proceeding is within the sound discretion of the Administrative Law Judge. See, State v. Ott, 167 Ariz. 420, 428, 808 P.2d 305, 313 (Ct. App. 1990) (citing Afro-Lecon v. United States, 820 F.2d 1198, 1202 (Fed. Cir. 1987)). Neither the federal nor the state constitution prohibits parallel civil and criminal proceedings. Id. (citing United States v. Kordel, 397 U.S. 1, 12 n. 27 (1970)). In fact, civil proceedings generally should be stayed only if parallel proceedings would substantially prejudice the defendant's rights. Id. (citing Securities and

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8 decisionmaker should consider the extent to which the defendant's Fifth Amendment rights may be
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11 following factors: (1) the interest of the plaintiff in proceeding expeditiously with the litigation and
12 any potential prejudice to plaintiff if the proceeding is delayed, (2) the burden that is imposed on the
13 defendant, (3) the convenience of the court in the management of its cases and the efficient use of
14 judicial resources, (4) the interests of persons that are not parties to the civil litigation, and (5) the
15 interest of the public in the pending proceedings. See, e.g., Keating, 45 F.3d at 324-25. When one
16 considers Van Campen's Fifth Amendment rights as well as the remaining factors, it is clear the
17 analysis does not support a stay of this proceeding.

18 **A. Van Campen's Fifth Amendment Rights are not Implicated in this Proceeding.**

19 Even where the same individual defendant is involved in both civil and criminal
20 proceedings, the courts can require a litigant to choose between invoking the Fifth Amendment in
21 a civil case, thus risking a loss there, or answering the questions in the civil context, thus risking
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8 45 F.3d at 326; Molinaro, 889 F.2d at 902-03.

9 The case for staying civil proceedings is "a far weaker one" when "[n]o indictment has been
10 returned [and thus] no Fifth Amendment privilege is threatened." Molinaro, 889 F.2d at 903
11 (quoting Dresser Industries, 628 F.2d at 1376). No indictments have been returned in this case, thus
12 no Fifth Amendment rights are threatened.

13 **B. The Division's Interest in Proceeding Expeditiously is Great.**

14 Any delay in prosecuting this matter will adversely affect the Division's interests. Dozens of
15 Arizona investors are waiting for an opportunity to have the merits of this case heard. Any delay
16 would have a detrimental effect on public confidence in the enforcement efforts of the Division. It is
17 appropriate for the Administrative Law Judge to consider this factor in determining whether a stay
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19 enforcement scheme for thrift institutions would occur from stay); Molinaro 889 F.2d at 903
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21 **C. Van Campen will not have any Greater Burden upon Denial of a Stay.**

22 Denial of a stay will not negatively affect (in fact, it may enhance) Van Campen's ability to
23 mount his defense in this case. Even though he may exercise his right to remain silent, Van Campen
24 will still be able to cross examine the witnesses against him (in this case, scores of investors and
25 others who will testify as to the often-complicated financial transactions involved in the fraud
26 perpetrated on investors and to authenticate the hundreds of documents involved), introduce and

1 challenge evidence, etc. The longer the delay as a result of a stay, the more likely it is that memories
2 will fade and the harder it will be for Van Campen to mount his defense.

3 **D. A Stay will not Provide Greater Convenience to the Parties and/or Division.**

4 A stay would be inconvenient not only because of the delay, but because the Division
5 would be forced to put on its case at least twice – first against respondents who are not the
6 subject of a stay and later against the others. Of course, a stay as to all respondents is out of the
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8 investors in this case and the public as a whole.

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10 It could be said that the harm to investors is complete and that investors do not have a
11 compelling need for immediate resolution of the Division's allegations. Such an argument does not
12 give the respect to, or understanding of, investors' positions that investors deserve.

13 This case involves dozens of investors who have lost more than money, they have lost faith.
14 The investors are seeking justice and an understanding of what exactly happened. They want to
15 know how they lost money when there were professionals like Van Campen involved with Mark
16 Bosworth and his companies. They want and deserve liability determined.

17 **F. The Public Interest will be Adversely Affected by a Stay.**

18 Citing uncontrolling authority, Van Campen essentially argues that the public's interest in a
19 prospective criminal case is entitled to precedence over this, pending case. Van Campen also argues
20 that, since the Division is immune to any statutes of limitation and since there are no ongoing sales
21 of securities, the public's interest will not be adversely affected by a stay. On the contrary, there is a
22 pressing need to determine the liability of parties involved in this tragic situation. As a regulatory
23 body, the Division is keenly aware of the need to reassure the public that it is seeking a
24 determination of responsibility. See, Keating, 45 F.3d at 326. It would be completely unacceptable
25 to allow this case to drag on unprosecuted for months, years even.
26

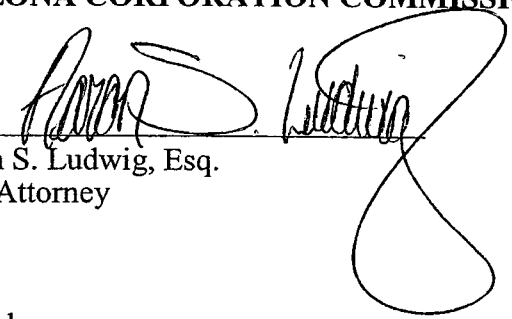
1 If the Division's allegations in its Notice are true, there is more to this case than just a
2 failure to disclose risks; there was actual perpetration of fraud by Van Campen. There can be no
3 stronger public interest than to send a message to the financial community that the Division will
4 take action against professionals when such action is warranted. Any delay would be detrimental
5 to public confidence in the enforcement scheme of the Securities Act. Id.

6 **III. CONCLUSION**

7 Based on the foregoing, it is apparent that Van Campen has not shown any prejudice, let
8 alone substantial prejudice, to his rights by this case proceeding. Van Campen's Fifth
9 Amendment rights are not implicated and the remaining factors all support the conclusion that
10 this matter should continue. Accordingly, the Joinder should be denied.

11 RESPECTFULLY SUBMITTED this 11th day of September 2008.

12
13 **SECURITIES DIVISION of the**
14 **ARIZONA CORPORATION COMMISSION**

15 
16 Aaron S. Ludwig, Esq.
17 Staff Attorney

18 **ORIGINAL** and **13 COPIES** of the foregoing filed
19 this 11th day of September 2008 with:

20 Docket Control
21 Arizona Corporation Commission
22 1200 W. Washington St.
23 Phoenix, AZ 85007

24 **COPY** of the foregoing mailed/delivered
25 this 11th day of September 2008 to:

26 The Honorable Marc E. Stern
Hearing Division
Arizona Corporation Commission
1200 W. Washington St.
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By: 

1
2
3 **BEFORE THE ARIZONA CORPORATION COMMISSION**

4 **COMMISSIONERS:**

5 KRISTIN K MAYES -- Chairman

6 GARY PIERCE

7 PAUL NEWMAN

8 SANDRA D. KENNEDY

9 BOB STUMP

10 **IN THE MATTER OF:**

11 MARK W. BOSWORTH and LISA A.

12 BOSWORTH, husband and wife;

13 STEPHEN G. VAN CAMPEN and DIANE V.

14 VANCAMPEN, husband and wife;

15 MICHAEL J. SARGENT and PEGGY L.

16 SARGENT, husband and wife;

17 ROBERT BORNHOLDT and JANE DOE

18 BORNHOLDT, husband and wife;

19 MARK BOSWORTH & ASSOCIATES, LLC,

20 An Arizona limited liability company;

21 3 GRINGOS MEXICAN INVESTMENTS, LLC;

22 An Arizona limited liability company

23 Respondents.

Docket No. S-20600A-08-0340

RESPONDENTS

MARK W. BOSWORTH

MARK BOSWORTH & ASSOCIATES, LLC

3 GRINGOS MEXICAN INVSTMENTS, LLC

RESPONSE TO THE SECURITIES
DIVISION'S MOTION TO SET HEARING

24 Respondents Mark W. Bosworth, Mark Bosworth & Associates, LLC and 3 Gringos
25 Mexican Investments, LLC respectfully objects to the Securities Division's (Division) motion to
26 set hearing. We already have a hearing-in progress!! There is no cause.

27 The division's claim on their reasoning is false and disingenuous at best. It is a
28 manipulation of the Administrative Law System. The division was at all times BEFORE Mark
Bosworth gave testimony perfectly aware of the question regarding 3GMI and the transfer of real
property.

1 The divisions made a conscience choice to manipulate the hearing by having
2 Bosworth testify then accost Mr. Bosworth in the hallway to attempt to manipulate the long and
3 carefully negotiated settlement. Mr. Bosworth did not intend to give up his Fifth Amendment
4 rights without the agreement in place, allegedly subject only to the commissioner's final
5 approval.
6

7 Mr. Ludwig agreed that Mr. Bosworth did a "wonderful job and has fully
8 complied with his agreement with the division."

9 Ms. Coleman agreed as well stating it was a "great job" and that the agreement
10 "was fully lived up" to by Mr. Bosworth.
11

12 The division has no authority to pull a respondent out of a hearing so they can get a better
13 shot at them alone in a separate hearing, an administrative version of double jeopardy. There is
14 no legal basis for their absurd request.

15 Additionally in the division's own motion of September 11, 2008(see attached), they
16 claim on page 4 #C "The division's interest in proceeding expeditiously is great"!! They
17 continue with "ANY delay in prosecuting this matter will adversely affect the division's
18 interests" and "ANY delay would have a detrimental effect on the public confidence in the
19 enforcement efforts of the division". They make the SAME EXACT claim on their September 5,
20 2008 filing in response to the Sargent's motion.
21

22 We raised relentless concerns about lack of proper trial preparation as follows "In
23 addition, they note that Bornholdt's very questionable alleged unavailability at this very late hour
24 further supports the need for a continuance, and support the Sargent's request for such. We are
25 gravely concerned this process will be compromised later because it has not been properly
26
27
28

1 planned for before it starts. Thank you.” The division would not hear of it! We had to go to trial
2 NOW!!

3 Both the division AND Mr. Sabo (by email) were advised in the objection to Bornholdt’s
4 telephonic testimony motion that the “Bosworth’s et al” had been left out of the time
5 management of the hearing etc.. etc... as follows “Respondent Bosworth was left out of the
6 pretrial conference in regards to planning and preparing for the time necessary to schedule and
7 execute an appropriate hearing due to pending settlement While not an attorney I find it unusual
8 to plan a hearing without this or any other information from Respondent Bosworth. On
9 Bornholdt alone we anticipate (6) to (8) hours to review general information, (2) two to (6) hours
10 for each of the alleged claims/victims for a total of (45) to (60) hours, (2) hours on his revoked
11 Notary license and bond, (3) hours on other ethical responsibility, duties and actions under
12 Arizona Administrative Code Title 4 Chapter 28 Article 11, (5) hours regarding Article 5 and all
13 advertising, (6) hours on his recruiting of victims in this case for the ACC and the documents,
14 claims and promises he made to them, not counting unexpected items. This is approx (60) hours
15 of who we believe is the key to this whole investigation, Bornholdt. Would we not lose the
16 whole case if one day Bornholdt decides or becomes unavailable? Seems very risky and
17 potentially costly and unnecessary. The Administrative Law Judge has given NO time limits or
18 time expectation to respondent Bosworth of any kind for this hearing and is fully aware of
19 respondent’s inability to retain counsel and that self-representation is the only reluctant choice
20 available to Bosworth”.

21 This motion was NOT filed specifically at the request of the division and a settlement
22 was suddenly reached within hours of them reading the document. While not filed at that time
23
24
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1 bath parties were aware then of the "Red Herring" and both did nothing to resolve the issue. The
2 motion was filed today with this response to become part of the record.

3 The division has known for months and did nothing. Now that they have Mr.
4 Bosworth's testimony they are singing a whole new tune.

5 Mr. Sargent was allowed a voluminous amount of time under the pretense he
6 would prepare to testify and not merely take the fifth on all his testimony. The Honorable
7 Administrative Law Judge Marc E. Stern saw fit to allow respondent Sargent all the time needed
8 to make the hearing fair and equitable. The Bosworth's deserve the same fair and equitable
9 treatment.
10

11 The Bosworth's are the only group not able to afford an attorney. During a
12 hearing Mr. Bosworth is the only person in the room not getting paid for being there. It would be
13 a huge, unfair and unbearable burden for Mr. Bosworth to now attend this hearing AND another
14 separate hearing months or years later.
15

16 What if some witnesses that are beneficial to Bosworth do not show up to testify for the
17 additional hearing?
18

19 The division is the one that insisted all along that there could not be separate
20 hearing and the respondent's must be heard together. Sargent and Bosworth both vigorously
21 sought separate hearings. Does the division now get to impose the additional burdens of time and
22 valuable financial resources two years later of preparing differently for ANOTHER HEARING?
23

24 Accordingly, Mark W. Bosworth, Mark Bosworth & Associates, LLC & 3
25 Gringos Mexican Investments vigorously oppose the Division's motion to set a hearing during
26 the middle of an existing hearing.
27
28

1
2 RESPECTFULLY SUBMITTED this 12th day of September 2010

3
4 By 

5 Mark Bosworth
6 18094 N. 100th Street
7 Scottsdale, Arizona 85255

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1
2 In contrast, telephonic testimony is generally inappropriate for significant witnesses or witnesses
3 dealing with contested issues. The physical presence of the witness provides the opportunity to
4 observe the witness's demeanor, facial expressions and body language. This is important to the
5 Administrative Law Judge in weighing the credibility of testimony. The opportunity to observe
6 the witness is also critical for an effective cross-examination. It alerts follow-up when the
7 witness, while answering, gives physical cues that might indicate uncertainty, confusion,
8 evasion, or untruths.
9

10 Respondent Bosworth has observed Bornholdt in person for hours in an extensive
11 deposition and has first hand knowledge Bornholdt's demeanor under oath in person will be
12 greatly diminished in value to respondent Bosworth by hiding the witness from the view of the
13 court, the public which he is licensed by the State of Arizona to represent, counsel, other
14 respondents and the Administrative Law Judge. Plainly stated the ACC is trying to hide a bad
15 witness. This action will greatly handicap remaining respondents and give an unnecessary and
16 unfair advantage to the ACC in this hearing. This would hardly be a level playing field. This
17 hearing has been on the calendar for months as noted in multiple responses from the ACC, the
18 ACC had the responsibility to prepare their witnesses properly for this long scheduled hearing.
19
20

21 Bornholdt testifying in person enables all parties to present exhibits directly to the
22 witness and to direct the witness's attention to specific parts or statements. Mr. Bornholdt is not
23 an average citizen/witness asked to give of his time for the benefit of the general public. Mr.
24 Bornholdt has already admitted to committing fraud and multiple other offenses totaling millions
25 of dollars in the State of Arizona, which he has failed at this point to report to the Arizona
26 Department of Real Estate where he continues to hold an active Real Estate Broker's license. In
27
28

1 addition, The State of Arizona Secretary of State where his performance bond was forfeited and
2 was required to pay in his behalf has revoked Bornholdt's notary license. Bornholdt has also
3 failed to report this as required by ARS to the Arizona Department of Real Estate. Bornholdt
4 also has several other industry ethics violations with the Arizona Board of Realtors where he had
5 to take additional ethics classes to settle their disciplinary actions from consumer complaints. Is
6 this really the type of witness the State intends to allow to hide behind a telephone line because
7 he ALLEGES he is unavailable? We sincerely doubt any assertion that Bornholdt is out of town
8 working or that any undue hardship would be placed upon him by requiring him to appear as a
9 witness at the hearing and no evidence has been offered to verify this new last minute claim.
10

11 Bornholdt is currently the licensed broker (license # BR007742000) for New Home
12 Brokers where he has the daily responsibility of managing the sales people under his license.
13 Mr. Bornholdt has given no notice or assignment of a temporary office manager in his alleged
14 absence nor has he applied for a change of address, change of license status or residency status,
15 which his alleged and unconfirmed out of town status would require.
16

17 Bornholdt is an extremely well compensated witness; he has already received (not just
18 promised) the benefit and relief of millions of dollars of liability and financial responsibility
19 being waived by his very curious settlement agreement with the ACC. In deed, the State of
20 Arizona and its citizens have paid millions of dollars in consideration for Bornholdt's agreement
21 to participate in this hearing and assist the ACC in its ongoing case against the remaining
22 Respondents Bosworth and Sargent.
23

24 The State of Arizona required Respondent Bosworth and the owners and officers of the
25 businesses to hire a designated broker that the State of Arizona had carefully screened, educated,
26 trained, tested and certified/licensed to oversee the real estate transactions of the real estate
27
28

1 business. Bornholdt was compensated hundreds of thousands of dollars for these duties, of
2 which he is now being called upon to testify. Given the huge number of exhibits and expected
3 rebuttal documents in this case, a telephonic witness will not have ready access to all of them.

4 Respondent Bosworth has extensive questioning of Bornholdt including his duties as a
5 designated broker. Bosworth anticipates calling extensive rebuttal witnesses in regards to
6 Bornholdt's testimony. We anticipate a minimum of three rebuttal witnesses and as many as
7 eleven rebuttal witnesses to include alleged victims and the recruiting done by Bornholdt on
8 behalf of the ACC among other things. We foresee extensive rebuttal documents being brought
9 into the hearing including videos of alleged seminars that include Bornholdt and other
10 respondents and many alleged victims. How is Bornholdt to identify
11 documents/signatures/persons including testifying extensively to his knowledge of where they
12 came from if he is not there to see them and authenticate them?
13
14

15 We anticipate extensive rebuttal documents that will include AAC Title 4 Chapter 28
16 Article 13 and former Arizona Department of Real Estate Commissioner Sam Wercinski. How
17 can Bornholdt review rebuttal documents and videos if he is not physically there? And even if
18 the witness has a copy, the chance for confusion or miscommunication is greatly reduced when
19 the witness is physically present at the hearing. Further, the absence of the witness prevents
20 respondents from impeaching the witness with new documents as we believe will be the case
21 with Bornholdt. Moreover, without the presence of the witness, there will be no "face to face"
22 communication between counsel and the witness during cross-examination – thus preventing all
23 parties from developing rapport with the witness, and as well a control over the rhythm of the
24 cross examination.
25
26
27
28

1 Respondent Bosworth was left out of the pretrial conference in regards to planning and
2 preparing for the time necessary to schedule and execute an appropriate hearing due to pending
3 settlement. While not an attorney I find it unusual to plan a hearing without this or any other
4 information from Respondent Bosworth. On Bornholdt alone we anticipate (6) to (8) hours to
5 review general information, (2) two to (6) hours for each of the alleged claims/victims for a total
6 of (45) to (60) hours, (2) hours on his revoked Notary license and bond, (3) hours on other
7 ethical responsibility, duties and actions under Arizona Administrative Code Title 4 Chapter 28
8 Article 11, (5) hours regarding Article 5 and all advertising, (6) hours on his recruiting of victims
9 in this case for the ACC and the documents, claims and promises he made to them, not counting
10 unexpected items. This is approx (60) hours of who we believe is the key to this whole
11 investigation, Bornholdt. Would we not lose the whole case if one day Bornholdt decides or
12 becomes unavailable? Seems very risky and potentially costly and unnecessary. The
13 Administrative Law Judge has given NO time limits or time expectation to respondent Bosworth
14 of any kind for this hearing and is fully aware of respondent's inability to retain counsel and that
15 self-representation is the only reluctant choice available to Bosworth.
16
17
18

19 If Bornholdt is going to be testifying he will not be able to "work" for days or possibly
20 more than a week, why not be here in person instead of somewhere else? His R/E license claims
21 he still lives in Scottsdale and resides there, or is that true? It seems the ACC would like to take
22 this extremely broad multi-million dollar claim they have made and sweep it out the door in a
23 few days like some parking ticket, without allowing the proper time this case warrants. How
24 much time is warranted in a 5 million dollar claim by the ACC?
25

26 Commission Administrative Law Judges have denied motions for telephonic testimony
27 for important witnesses. For example, Judge Martin denied a motion to allow telephonic
28

1 testimony when the testimony was from the applicant's only witness.¹ Likewise, Judge Kinsey
2 denied a motion to allow telephonic testimony where the witness was needed to address specific
3 issues of concern, as well as to "generally support the application and provide additional
4 information or clarification."²

5 Here, the Division describes Bornholdt as a "central witness" in the case who will
6 provide "highly probative testimony."³ This is exactly the type of witness that should never be
7 allowed to testify telephonically. Bornholdt, as an important witness, should be present in
8 person, so that he can be properly cross-examined in person, and that all parties including the
9 Administrative Law Judge can observe his demeanor, facial expressions and body language.
10

11 Accordingly, Mark W. Bosworth, Mark Bosworth & Associates, LLC & 3 Gringos
12 Mexican Investments vigorously oppose the Division's motion to allow Bornholdt to testify by
13 telephone. In addition, they note that Bornholdt's very questionable alleged unavailability at this
14 very late hour further supports the need for a continuance, and support the Sargent's request for
15 such. We are gravely concerned this process will be compromised later because it has not been
16 properly planned for before it starts. Thank you.
17
18
19
20

21 *12th September*
RESPECTFULLY SUBMITTED this 2nd ~~day~~ of June 2010

22
23 By 

24 Mark Bosworth
25 18094 N. 100th Street
Scottsdale, Arizona 85255

26 ¹ Procedural order dated February 24, 2009 in Docket No. T-03446A-08-0055.

27 ² Procedural Order dated September 24, 2007 in Docket No. T-03228A-06-0800.

28 ³ Division Motion at 2:3-4.

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